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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA, *ex rel.*
GNGH2 Inc.,

Plaintiff-Relator,

v.

SW NORTH AMERICA INC.,

Defendant.

Civil Action No. 3:24-CV-1123-N

SEALED

**JOINT STIPULATION OF VOLUNTARY DISMISSAL
BY THE UNITED STATES AND RELATOR**

Pursuant to the Settlement Agreement executed by and amongst the United States, Defendant SW North America, Inc., and Relator GNGH2, the United States and Relator, by and through their respective attorneys, hereby jointly stipulate and agree, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), to the dismissal of this action on the following terms: (1) as to the United States, the dismissal is with prejudice as to the Covered Conduct as defined in the Settlement Agreement, and otherwise without prejudice to the United States; and (2) as to the Relator, the dismissal is with prejudice.

Relator stipulates and agrees that the Settlement Agreement referenced herein and the terms and conditions described therein are fair, adequate, and reasonable under all the circumstances in this case, that Relator will not challenge the settlement pursuant to 31

U.S.C. § 3730(c)(2)(B), and that Relator expressly waives the opportunity for a hearing on any objection to the settlement under 31 U.S.C. § 3730(c)(2)(B).

Respectfully submitted,

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY

GNGH2 INC.

**ANDREA
HYATT**

Digitally signed by
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Date: 2025.03.27
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Attorney for Relator GNGH2 Inc.

CERTIFICATE OF SERVICE

On April 2, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b) (2).

/s/ Andrea Hyatt
Andrea Hyatt
Assistant United States Attorney